

Complaint filed by: Paul Dunlap
111 Hekili Street, Suite A-116
Kailua, HI 96734

Office of General Counsel,
Federal Election Commission,
999 E Street, N.W.,
Washington, D.C. 20463

MUR # 5560

10/7/04

RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL

2004 OCT 12 A 11:27

Complaint Against Rep Ed Case and Case for Congress C00382978

I have personal knowledge of each of the violations listed below.

Violation 1: Accepting contributions made in the name of another

According to local news reports, Case campaigns have a history of accepting illegal contributions made in the name of others. The Honolulu Star-Bulletin 10/07/04 reports that while running for Governor the Case campaign accepted illegal contributions. The State Campaign Spending Commission investigated the matter and found the Case donors guilty and they had to pay a \$150,000 fine. See attachment.

In particular, money seems to have been funneled to the Case campaign from wealthy donors in the Kamuela 96743 (Big Island) area. There is a disproportionate high volume of donors from that zip code. Case is known to have wealthy agricultural supporters in Kamuela who must have given the money to Case's campaign through family and friends.

Violation 2: Illegal corporate contributions

a. Maui Land and Pineapple Co

We can further the link between multi-millionaire agricultural landowner Steve Case and agricultural committee member Ed Case, not only are they related but his companies are a sizable donor to Case's campaign for Congress:

Steve Case, AOL-Time Warner - \$2,000

Mr & Mrs David Cole, Maui Land & Pineapple Co. (Steve Case owned) - \$2,000

Brian Nishida, Maui Land & Pineapple Co. (Steve Case owned) - \$1,000

Randall Endo, Maui Land & Pineapple Co. (Steve Case owned) - \$400

Warren Suzuki, Maui Land & Pineapple Co. (Steve Case owned) - \$1,000

Steve Case is clearly channeling funds from his controlling interest in Maui Land and Pineapple to his cousin who is on the Agriculture committee in Congress.

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b. National Group

Following the spirit of multiple donors from 1 company, Case is in the pockets of big business, as he has hardly any small-business donors. Case has 4 donors from "The National Group" the lobbying firm of a high-profile Washington D.C. law firm (whose principle William Oldaker, is a long-term Democratic operative). His firm represents major corporate interests, including Delta Air Lines, which is seeking corporate welfare to shore up its losses, and Equifax a major repository of credit information.

John Blount, National Group - \$250

Jeffrey Lawrence, National Group - \$500

Vincent Versage, National group - \$3,000

William Oldaker, Oldaker Biden & Belari - \$500

See:

<http://www.allamericanpatriots.com/m-news+article+storyid-3379.html>

<http://www.thenationalgroup.net/clients.php>

c. Phoenix Group

Case accepted a prohibited \$1,000 contribution from Phoenix Group LLC which is also registered as Maui Plastic Surgery Corporation.

d. North Hawaii Healthcare Group

Case accepted a prohibited \$500 contribution from North Hawaii Healthcare Group which is a Corporation.

Violation 3. Attempting to Disguise Contributor Information

The Case campaign has attempted to hide contributor information of E. Brogio, Kailua. There is no first name provided.

Sincerely,



Paul Dunlap

Subscribed and Sworn to before me this

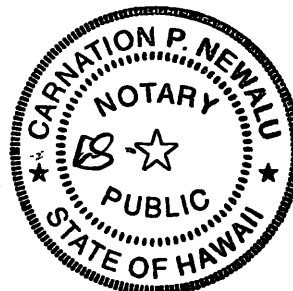
7th day of Oct, 2004.

Carnation P. Newalu

Notary Public State of Hawaii

Commission expires: 4-2-2008

Carnation P. Newalu



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Starbulletin.com

Thursday, October 7, 2004

— ADVERTISEMENTS —

Companies could pay fine in settlement over campaign donations

By Rick Daysog
rdaysog@starbulletin.com

A local engineering firm and its sister company have reached a settlement with the state Campaign Spending Commission over allegations that they made illegal political donations to Honolulu Mayor Jeremy Harris, Gov. Linda Lingle and other prominent local politicians.

KFC Engineering Management Inc. and KFC Airport Inc. have agreed to pay a stiff fine to settle the commission's investigation that the firms gave more than \$150,000 in excess and false-name contributions.

Recipients of the alleged illegal contributions include the campaigns of Harris, Lingle, U.S. Rep. Ed Case, ex-Gov. Ben Cayetano, former Lt. Gov. Mazie Hirono, past Maui Mayor James "Kimo" Apana, former state Sen. Matt Matsunaga, ex-Big Island mayoral candidate Fred Holschuh and former City Councilman Jon Yoshimura.

Bob Watada, the commission's executive director, declined to disclose the amount of the proposed fine, which requires the approval of the commission's five-member board when it meets on Wednesday.

Case
accepting
Illegal
contributions

By law, the commission can fine KFC triple the dollar amount of the illegal political donations. But in most cases the state agency has opted for fines of about \$1,000 for each illegal contribution.

The commission is alleging that KFC made more than 50 false-name and excessive political contributions.

Dexter Kubota, KFC's president, and Brian Bowers, KFC Airport's president, could not be reached for comment.

Between 1999 and 2001, KFC Airport gave more than \$51,000 to the Harris campaign in the names of employees and their relatives, the commission said. During the same period, the company gave \$16,000 in false-name contributions to the Apana campaign, \$8,000 to the Matsunaga campaign and \$4,000 to the Holschuh campaign, the commission said.

Sister company KFC Management made \$25,000 in false-name contributions to the Cayetano campaign and \$31,165 to the Hirono campaign, the commission said. Between 1998 and 2002 the company gave \$12,500 to the Lingle campaign through its employees and their relatives, the commission said.

State law bars donors from making more than \$4,000 in donations to mayoral candidates during a four-year election cycle. They also are prohibited from making donations in false names in order to circumvent state campaign finance limits.

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SCHEDULE A (FEC Form 3)
ITEMIZED RECEIPTS

 Use separate schedule(s)
 or each category of the
 Detailed Summary Page

FOR LINE NUMBER: PAGE 8 / 22

(check only one)

<input checked="" type="checkbox"/> 11a	<input type="checkbox"/> 11b	<input type="checkbox"/> 11c	<input type="checkbox"/> 11d	<input type="checkbox"/> 15
12	13a	13b	14	

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.


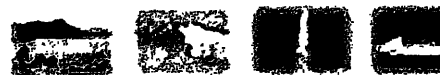
NAME OF COMMITTEE (In Full) Case for Congress			
Full Name (Last, First, Middle Initial) A. Phoenix Group, LLC		Date of Receipt 03 / 31 / 2004	
Mailing Address 33 Lono Avenue Suite 300		Transaction ID: SA11ai-c3233	
City Honolulu	State HI	Zip Code 96732	Amount of Each Receipt this Period 1000.00
FEC ID number of contributing federal political committee. C			
Name of Employer	Occupation	Limit Increased Due to Opponent's Spending (2 U.S.C. 441a(j)(4)(1a-1))	
Receipt For: 2004 Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify) ▼	Election Cycle-to-Date ▼ 1000.00		

Illegal corporate contribution

SUBTOTAL of Receipts This Page (optional)	1000.00
TOTAL This Period (last page this line number only)	5400.00

FEC Schedule A (Form 3) Rev. 02/2003

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	State Online Services	Hawaii Information Link Index	
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Department of Commerce and Consumer Affairs

Business Registration Division

Business Name Search

Purchase Certificate of Good Standing

New Search

General Information		
Business Entity Name	PHOENIX GROUP, LLC	
Record Type	Master Name for a Domestic Limited Liability Company (LLC)	
File Number	3180 C5	
Status	Active	
Place Incorporated	Hawaii UNITED STATES	
Registration Date	07/01/1999	
Mailing Address	33 LONO AVE STE 300 KAHULUI Hawaii 96732 United States of America	
Consent Name	MAUI PLASTIC SURGERY CORPORATION	
Term	AT-WILL	
Managed by	MEMBER(S)	
Agent Info		
Agent Name	S. LARRY SCHLESINGER	
Agent Address	33 LONO AVE STE 300 KAHULUI Hawaii 96732 United States of America	
Annual Filing Info		
Filing Year	Filing Status	
2004	Processed	
2003	Processed	
2002	Not Filed	
2001	Processed	
2000	Processed	
1999	Processed	
Officer Information		
Name	Office	Date
SCHLESINGER,STEPHEN LARRY MD	MEM	07/01/1999

\$1,000 contribution

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Transaction Information		
Date	Code	Remarks
08/20/2002	Name Change	Name Change
07/01/1999	Articles of Organization	ARTICLES OF ORGANIZATION FOR LIMITED LIABILITY COMPANY

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SCHEDULE A (FEC Form 3)
ITEMIZED RECEIPTS

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 Detailed Summary Page

FOR LINE NUMBER: PAGE 17 / 131

<input checked="" type="checkbox"/> 11a	<input type="checkbox"/> 11b	<input type="checkbox"/> 11c	<input type="checkbox"/> 11d
<input type="checkbox"/> 12	<input type="checkbox"/> 13a	<input type="checkbox"/> 13b	<input type="checkbox"/> 14
<input type="checkbox"/> 15			




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NAME OF COMMITTEE (In Full) Case for Congress	
A Full Name (Last, First, Middle Initial) Mr. Donald J. Winters Mailing Address PO Box 1303 City State Zip Code Kamuela HI 96743 FEC ID number of contributing federal political committee. C Name of Employer Waikooke Cattle Co., Inc. Receipt For: 2004 X Primary General Other (specify) Occupation Vice-President Election Cycle-to-Date 450.00	Date of Receipt 07 17 2004 Transaction ID: SA11ai-4731 Amount of Each Receipt this Period 450.00 In-kind Beef-90#-Kamuela Limit Increased Due to Opponent's Spending (2 U.S.C. 441af)(441a-1)
B. Full Name (Last, First, Middle Initial) Mr. Harry D. Michael Mailing Address PO Box 2339 City State Zip Code Kamuela HI 96743-2339 FEC ID number of contributing federal political committee. C Name of Employer Self-employed Receipt For: 2004 X Primary General Other (specify) Occupation Artist Election Cycle-to-Date 575.00	Date of Receipt 07 17 2004 Transaction ID: SA11ai-4733 Amount of Each Receipt this Period 575.00 In-kind Artwork For Raffle:- Kamuela Limit Increased Due to Opponent's Spending (2 U.S.C. 441af)(441a-1)
C. Full Name (Last, First, Middle Initial) North Hawaii Health Care Group LLC Mailing Address PO Box 7110 City State Zip Code Kamuela HI 96743 FEC ID number of contributing federal political committee. C Name of Employer Receipt For: 2004 X Primary General Other (specify) Occupation Election Cycle-to-Date 500.00	Date of Receipt 07 17 2004 Transaction ID: SA11ai-c4492 Amount of Each Receipt this Period 500.00 Limit Increased Due to Opponent's Spending (2 U.S.C. 441af)(441a-1)
SUBTOTAL of Receipts This Page (optional) 1525.00	
TOTAL This Period (last page this line number only)	

FEC Schedule A (Form 3) Rev. 02/2003

Illegal Corporate contribution

2604130588

	State Online Services	Hawaii Information Link Index	
Department of Commerce and Consumer Affairs			
Business Registration Division		Business Name Search	

Purchase Certificate of Good Standing

New Search

General Information		
Business Entity Name	NORTH HAWAII HEALTH CARE GROUP, LLC	
Record Type	Master Name for a Domestic Limited Liability Company (LLC)	
File Number	4020 C5	
Status	Active	
Place Incorporated	Hawaii UNITED STATES	
Registration Date	12/15/1999	
Expiration Date	12/31/2050	
Mailing Address	65-1267 KAWAIHAE RD KAMUELA Hawaii 96743 United States of America	
Managed by	MEMBER(S)	
Agent Info		
Agent Name	LYN M. LAM	
Agent Address	65-1267 KAWAIHAE RD KAMUELA Hawaii 96743 United States of America	
Annual Filing Info		
Filing Year	Filing Status	
2004	Not Filed	
2003	Processed	
2002	Not Filed	
2001	Processed	
2000	Processed	
1999	Processed	
Officer Information		
Name	Office	Date
LAM, LYN M	MEM	12/15/1999
Transaction Information		

illegal corporate contribution \$500

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**SCHEDULE A (FEC Form 3)
ITEMIZED RECEIPTS**Use separate schedule(s)
or each category of the
Detailed Summary Page

FOR LINE NUMBER PAGE 52 / 131

(check only one)

<input checked="" type="checkbox"/> 11a	<input type="checkbox"/> 11b	<input type="checkbox"/> 11c	<input type="checkbox"/> 11d
<input type="checkbox"/> 12	<input type="checkbox"/> 13a	<input type="checkbox"/> 13b	<input type="checkbox"/> 14
<input type="checkbox"/> 15			

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NAME OF COMMITTEE (In Full)

Case for Congress

Full Name (Last, First, Middle Initial) A. Lele A. Bolosan		Date of Receipt 08 / 19 / 2004
Mailing Address PD Box 1522		Transaction ID: SA11ai-c4519
City Kihai	State HI	Zip Code 96753
FEC ID number of contributing federal political committee. C		Amount of Each Receipt this Period 800.00
Name of Employer not employed Receipt For: 2004 <input checked="" type="checkbox"/> Primary General Other (specify) ▼		Limit Increased Due to Opponent's Spending (2 U.S.C. 441a(f)(4)(1a-1))
Occupation Student Election Cycle-to-Date ▼ 800.00		
Full Name (Last, First, Middle Initial) B. E. Brogle		Date of Receipt 08 / 19 / 2004
Mailing Address 392 Awakea Road		Transaction ID: SA11ai-c4553
City Kailua	State HI	Zip Code 96734
FEC ID number of contributing federal political committee. C		Amount of Each Receipt this Period 300.00
Name of Employer Information Requested Receipt For: 2004 <input checked="" type="checkbox"/> Primary General Other (specify) ▼		Limit Increased Due to Opponent's Spending (2 U.S.C. 441a(f)(4)(1a-1))
Occupation Information Requested Election Cycle-to-Date ▼ 300.00		
Full Name (Last, First, Middle Initial) C. Mr. Charles D. Fox III		Date of Receipt 08 / 19 / 2004
Mailing Address 2481 Kaanapali Pkwy #1101		Transaction ID: SA11ai-c4514
City Lahama	State HI	Zip Code 96781
FEC ID number of contributing federal political committee. C		Amount of Each Receipt this Period 400.00
Name of Employer Retired Receipt For: 2004 Primary <input checked="" type="checkbox"/> General Other (specify) ▼		Limit Increased Due to Opponent's Spending (2 U.S.C. 441a(f)(4)(1a-1))
Occupation Retired Election Cycle-to-Date ▼ 2400.00		

SUBTOTAL of Receipts This Page (optional) **1500.00**TOTAL This Period (last page this line number only) **▶**

FEC Schedule A (Form 3) Rev. 02/2003